

Re: Stormwmater FSP/Rationale Comment Resolutions



Kristine Koch to: Carl Stivers

Cc: Andy Koulermos, "Sanders, Dawn", "Scheffler, Linda", Laura Jones, Simon Page, TARNOW Karen E

02/05/2007 01:23 PM

Carl,

I think the FSP must be able to stand on its own as a document and that there needs to be some discussion of Background, Purpose, and Summary Approach in the beginning. I really stripped it down, though, because there is more in the Rational and readers should be directed to those documents - no need to say it twice.

I went ahead and added a DQO section, but if the DQOs for the laboratory are already in the QAPP, then the FSP should just state that. I did put in some others that were specific to sampling, though. Feel free to edit or add others if you think of them.

I agree with your approach for the other "EPA added text".

I leave at 3:30, but I am available before that if you have any further questions or would like to discuss.

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Carl Stivers <cstivers@anchorenv.com> 02/05/2007 12:34 PM

To "Sanders, Dawn" < DAWNS@BES.CI.PORTLAND.OR.US>, Laura Jones < liones@integral-corp.com >, Kristine Koch/R10/USEPA/US@EPA, Andy Koulermos <akoulermos@newfields.com>, TARNOW Karen E <TARNOW.Karen@deg.state.or.us>, "Scheffler, Linda" <LindaSC@BES.CI.PORTLAND.OR.US>, Simon Page <spage@anchorenv.com>

Subject Stormwmater FSP/Rationale Comment Resolutions

All -

I have reviewed the comments on the Stormwater Rational and FSP to look for any major issues that require discussion. I suggest we have the call at 3:30 pm today if there are any objections to the items noted below. Please let us all know ASAP if we need the meeting, so people have time to coordinate and

I think the one major issue is purely organizational edits to the Rationale. Karen Tarnow suggested some reorganization and simplification of Sections 1.2 and 1.3 at about 4 pm on Friday. Dawn followed up with her own reorganization of the rationale at about 6 pm the same day. Dawn indicated to me that

she had talked to Karen about these changes and, I think, had reached some type of agreement. Therefore, I am moving ahead with the Rationale organizational changes per Dawn's version, unless someone (Karen?) has an objection. If there are objections, we should probably have a call at 3:30 today to resolve this one.

Other comments that I think are less likely to require discussion are noted below. Please let us all know ASAP if you think any of these require discussion amongst the team either via email or at a call at 3:30 today:

EPA Comment: Kristine added some upfront text to the FSP on Background, Purpose, and Summary Approach.

Anchor Response: Based on Kristine's original suggestion to split out the text into Rationale vs. FSP, it seems like most folks were in favor of very minimal content of this type up front in the FSP (and this is reflected in most folks comments on the Revised Split of the FSP text). Consequently, I'd suggest leaving this type of information solely to the rationale and out of the FSP introduction.

EPA Comment: Kristine added a Data Quality Objectives Section to the introduction of the FSP.

Anchor Response: I think some of this type of information is already contained within the Project QAPP and referred to by the Stormwater QAPP. However, my intent is to go through this and make sure that new or non-redundant information be included here, because I think a section on DQOs is a good idea for the FSP in general.

EPA Comment: Text was added in a number of sections on additional procedures that should be described.

Anchor Response: We will attempt to reflect all these changes as intended. Note in some cases the text provided may not be consistent with the actual procedures we intended and/or detailed in the SOPs, so the inserted text will be adjusted as needed in these cases. Also, it appears that in a few cases very similar text is included either in the FSP or the SOPs and our intent is to compare the proposed insertion to the existing text and make sure (1) that any new content or procedures are in fact included in the revised text or (2) the reader is clearly guided to the locations of the existing text (either with or without modifications per the recommended insertion).

DEQ Comment: Section 1.2, bullets on LWG objectives. I understood an additional EPA/LWG RI/FS Objective was to understand stormwater direct risk contribution to in-water receptors..., i.e., direct contact (i.e., what risk the chemicals in the water pose to aquatic receptors thru direct contact) as opposed to "contribution to in-river fish tissue chemical burdens"..., which is the indirect, bioaccumulation risk pathway. This comment is partially resolved by text in the 1st sentence of Section 1.2.1 ("and related risk"), but still..., it would be helpful to add another bullet to Section 1.2 (page 2) stating another objective is to understand stormwater contribution to direct risk.

Anchor Response: I would prefer not to add this objective since it had not been previously agreed to. Right now as stated in the comment, this objective is not a primary one identified for the RI/FS. That is not to say that this information will be useless with regards to understanding this issue for the RI/FS.

Laura Jones Comment: I added most of the text from the Section 1.3 to this revised FSP because I thought the reader needed this summary of the program prior to the rest of the text in Section 2. Although this may be redundant to the rationale document, I think it adds needed perspective at the beginning of the FSP.

Anchor Response: I am making this change unless someone has an objection since it results in fairly minimal redundant text between the two documents. Seemed someone might think that this runs counter to some of our approach in making the split between rationale and FSP documents (as noted above), so I

wanted to check.

Port Comment: My main recommendation is to strip out all the text that is reproduced in SOPs/appendices. I've had problems with attorney reviews in the past where things are phrased differently in different parts of the document.

Anchor Response: We will do this to the extent it does not make the SOP un-usable as a stand alone procedure. That is, we want people in the field be able to read the SOPs, and with a general background on the project, be able to execute the procedure without having to refer to a lot of other sections and documents. I think in many cases we will be able to simply delete redundant text, but in some cases you may see some repeat language here and there.

Thanks.

Carl

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